

JAMES PHILLIP VAUGHNS, CSBN 124040
Law Offices of James P. Vaughns
6114 LaSalle Avenue, Suite 289
Oakland, CA 94611
(510) 583-9622

Counsel for Defendant Ashiegbu

IN THE UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

ANDREW IHENTUGE ASHIEGBU,

Defendant.

) No. CR 07-0677 CRB
)
) DEFENDANT ANDREW
) ASHIEGBU'S REPLY TO
) UNITED STATES'
) OPPOSITION TO HIS
) MOTION TO TAKE RULE 15
) DEPOSITIONS
)
) Date: June 11, 2008
) Time: 2:15 p.m.
) Hon. Charles R. Breyer

Defendant Andrew Asheigbu hereby replies to the United States' Opposition to his Motion to Take Rule 15 depositions as follows:

The United States has not indicated, through its counsel, that it knows of any reason Alice Anyanwu would not be able to avail herself of the B-2 nonimmigrant visa process to secure her presence at defendant's trial. Defendant submits that Alice Anyanwu will attempt to do so and, thus, asks that this motion be held in abeyance until such time as defendant can apprise the Court of Ms. Anyanwu's progress in that regard. Assuming that a trial date will be set within several months, there should be enough time for the nonimmigrant process to bear results either positive or negative.

Regarding the possibility of a conflict of interest as identified by the government's counsel in its Response to defendant Andrew Ashiegbu's Joinder in defendant Linda

1 Ashiegbu's Motion to Suppress Statements, the undersigned counsel, and defendant
2 Andrew Ashiegbu, welcome the opportunity to express to the Court at a hearing the facts
3 surrounding counsel's retention and acquisition of information, its timing, and any other
4 topic the Court finds relevant to its inquiry.

5
6
7
8 Dated: May 30, 2008

Respectfully submitted,

9
10
11 JAMES PHILLIP VAUGHNS
12 Attorney for ANDREW ASHIEGBU
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28